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**From:** Moran, Kendra [Moran.Kendra@epa.gov]  
**Sent:** 9/27/2017 11:25:58 AM  
**To:** Bauer, Jeff [Bauer.Jeff@epa.gov]; Wright, Tracy [Wright.Tracy@epa.gov]; Eisenreich, Karen [Eisenreich.Karen@epa.gov]; Nguyen, Nhan [Nguyen.Nhan@epa.gov]  
**Subject:** RE: P-16-0400

I don't understand why I am on this email. Tracy is the ecotox assessor and the question posed by the submitter is pretty straight forward. Did Tracy review the submitter's read-across approach when bringing forward the FOCUS conclusion that involved chronic aquatic toxicity testing.

Kendra

Kendra Moran, U.S EPA  
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**From:** Bauer, Jeff  
**Sent:** Tuesday, September 26, 2017 3:35 PM  
**To:** Wright, Tracy <Wright.Tracy@epa.gov>; Eisenreich, Karen <Eisenreich.Karen@epa.gov>; Nguyen, Nhan <Nguyen.Nhan@epa.gov>  
**Cc:** Moran, Kendra <Moran.Kendra@epa.gov>  
**Subject:** RE: P-16-0400

Tracey, I followed up with the submitter and will call her again to let her know we are going to put something together for the Protocols to do the Chronic testing on this PMN. This submission is Non CBI.

Thanks  
Jeff

Jeff Bauer - Program Manager  
United States Environmental Protection Agency (USEPA)  
Office of Pollution Prevention and Toxics (OPPT)  
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**From:** Wright, Tracy  
**Sent:** Friday, September 22, 2017 2:18 PM  
**To:** Eisenreich, Karen <Eisenreich.Karen@epa.gov>; Nguyen, Nhan <Nguyen.Nhan@epa.gov>  
**Cc:** Bauer, Jeff <Bauer.Jeff@epa.gov>; Moran, Kendra <Moran.Kendra@epa.gov>  
**Subject:** FW: P-16-0400

This is the first I've been directly contacted by a submitter- not sure how I should be responding.

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R. Tracy Wright, Biologist  
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**From:** Delina.Lyon@shell.com [mailto:Delina.Lyon@shell.com]  
**Sent:** Tuesday, September 19, 2017 2:27 PM  
**To:** Wright, Tracy <Wright.Tracy@epa.gov>  
**Subject:** P-16-0400

Hello Tracie,

I hope this email finds you well. We met a couple of years ago at SETAC, and I learned recently that you are the ecotoxicologist on a PMN that we submitted last year (P-16-0400), for which Jeff Bauer is the case manager. Jeff indicated to our product steward, Melissa Ford, that I could discuss questions with you directly, so I hope you don't mind my reaching out to you.

To summarize, on June 6, 2016, Shell Oil Company submitted a PMN (P-16-0400) for a C11-16 Gas-to-Liquid (GTL) Solvent, termed GS 1927. No aquatic toxicity test data on GS 1927 was submitted; however, a read-across argument was made using testing data for analogous GTL solvents (see table below). All of the GTL substances are fractionates from a common feedstock - GTL Diesel/Gas Oil. GS 1927 is, in effect, equivalent to GS 190, GS 215 and GS 250 combined (all recently placed on TSCA inventory, PMN P-14-132 thru 136). Based on the chronic aquatic toxicity testing undertaken at the behest of EPA on GS 190 and GS 170, the PMNs P-14-132 thru 136 were dropped in 2015. We used the same chronic aquatic toxicity testing data as well as other information to support the registration of GS 1927 (P-16-0400).

Shell GTL Solvent	Chemical name	CAS Number	On TSCA Inventory
GTL Gas Oil	Distillates (Fischer-Tropsch), C8 – C26, branched and linear	848301-67-7	Y
GS160	Alkanes, C8-11-branched and linear	1437281-13-4	Y
GS170	Alkanes, C9-12-branched and linear	1437281-04-3	Y
GS190	Alkanes, C10-13-branched and linear	185857-36-7	Y
GS210	Alkanes, C9-13-branched and linear	1437280-84-6	Y
GS215	Alkanes, C12-15-branched and linear	1437281-03-2	Y
GS250	Alkanes, C14-16-branched and linear	1174918-46-7	Y
GS270	Alkanes, C15-19-branched and linear	1437281-01-0	Y
GS310	Alkanes, C18-24-branched and linear	1437280-85-7	Y
GS1927	Alkanes, C11-16 branched and linear	1809170-78-2	subject of this PMN

I was wondering if you've had a chance to review this read-across document, which was submitted with the PMN package. After the focus review, Jeff had indicated that Shell would need to perform a chronic aquatic toxicity base set for GS 1927, but he did not provide any feedback on whether the read-across document was reviewed or why it was not accepted.

I look forward to hearing from you. I will also be at SETAC this year, so I hope to get to see you there. Thank you for your time!

Kind regards,  
Del

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